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**THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEVADA**

In re:	Case No. 09-34342-LBR
Nicholas DiPuccio, and	Chapter 13
Jeannie DiPuccio, Debtors.	Hearing Date: April 12, 2010 Hearing Time: 10:30 A.M.

**OPPOSITION TO THE MOTION FOR RELIEF FROM AUTOMATIC  
STAY FILED BY U.S. BANK NATIONAL ASSOCIATION**

Nicholas DiPuccio and Jeannie DiPuccio (the “**Debtors**”), the Debtors in the above-captioned proceeding, file this Opposition (the “**Opposition**”) to U.S. Bank National Association’s, (“**U.S. Bank**”, or the “**Secured Creditor**”) Motion for Relief from Automatic Stay (the “**Motion**”) and in support of the Opposition, states as follows:

**FACTS**

1. HSBC Bank USA filed its Motion on March 11, 2010 to foreclose on the Debtors’ property located at 10921 Cardinal Crest, Las Vegas, NV 89144 (the “**Property**”).
2. The Debtors have been attempting to negotiate a Loan Modification with Wells Fargo Bank, through their attorneys, the Schwartz Law Firm (“**SLF**”) since December, 2009.

1           3. Debtors were forced to become delinquent as a result of Wells Fargo's  
2 unwillingness to negotiate a loan modification while they were current on their payments.

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4           4. Debtors request that they be permitted to participate in the Nevada Foreclosure  
5 Mediation Program.

6           WHEREFORE, the Debtors respectfully request that the Court enter an order (i) denying  
7 the Motion and allowing the Debtors to participate in the Nevada Foreclosure Mediation  
8 Program; and (ii) granting such other and further relief as is just and proper.  
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12 Dated this 25<sup>th</sup> day of March, 2010.

13 /s/Sean E. McClenahan  
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